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MARINE BUILDINGS, PENARTH

SURVEY FOR BATS

THE VALE OF GLAMORGAN COUNCIL (PLANNING DIVISION)

RE-REGISTERED

HEAD OF PLANNING AND TRANSPORTATION

July 2011

ACCI ECOLOGY

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DOCUMENT CONTROL

Revision	Date	Prepared by	Checked by
1.0	18 July 2011	P Hudson Director	C Ormerod Company Secretary

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Executive Summary

Site Location	Acer Ecology Ltd was commissioned by Skyasset Ltd to conduct a survey of Marine Buildings in Penarth, Vale of Glamorgan, south Wales (OS grid reference: ST 189 724) for bats and other protected species.
Survey Methodology	The survey comprised the following: • A daytime internal and external inspection of the buildings searching for signs of bats and other protected species. • Two emergence surveys of the buildings.
Results of Building Inspections for Bats	No signs of bats were found anywhere in or around the buildings.
Inspections for bats	There were no signs of roosting butterflies (such as small tortoiseshell <i>Aglais urticae</i> and peacock <i>Inachis io</i>), roosting moths (such as herald moth <i>Scoliopteryx libatrix</i>) or cluster flies <i>Pollenia</i> sp, all of which frequently occur in buildings used by bats.
Potential for Buildings to Support Roosting or Hibernating Bats	The survey found no evidence to indicate that the buildings are occupied by roosting bats, and the buildings were assessed as being of low suitability and attractiveness for roosting bats.
Inibernating bats	There are many potential routes of access for bats into the interiors of the buildings, arising from the gaps in the roof, fascias and soffits etc. The interiors of the buildings were found to be comparatively well-illuminated and draughty, with ample exposure to the elements via gaps around the boarded up windows and doors, and through gaps in the roof and are therefore unlikely to provide dark, stable microclimates of the kind which bats normally seek for daytime roosting.
	The buildings were assessed as having low potential for supporting hibernating bats within cracks and cavities of the walls of the building.
Evidence of Nesting Birds	The buildings are heavily used by feral pigeon, with evidence of recent nesting.
Requirements for Additional Survey	None.
Licensing Requirements	None.
Recommendations	Demolition of the buildings should take place from October to February outside the bird breeding season (March to September inclusive) to avoid the possibility of encountering nesting birds, and reduce the already negligible/low probability of encountering summer-roosting bats. Alternatively, any works which must necessarily be carried out during this period should be preceded by a survey to ensure that no nesting birds are present, and any which are present must be allowed to complete their nesting cycle undisturbed.
	The services of an appropriately qualified and licensed ecological consultant should be available on an 'on-call' basis at all stages of the demolition to deal with any unexpected encounters with bats or nesting birds.
	Building contractors should be warned of the possible presence of roosting bats (and/or nesting birds), and of their protected status. It should be clearly understood that in the event of any bats (or occupied birds' nests) being found the contractor must halt works and seek advice from an ecological consultant or the Countryside Council for Wales.

1.0 Introduction

1.1 Brief

Acer Ecology Ltd was commissioned by Skyasset Ltd to conduct a survey of Marine Buildings in Penarth, Vale of Glamorgan, south Wales (OS grid reference: ST 189 724) for bats and other protected species.

The survey comprised the following:

- A daytime internal and external inspection of the buildings searching for signs of bats and other protected species.
- Two emergence surveys of the buildings.

Bat roosts are fully protected under the Wildlife and Countryside Act 1981, the Conservation (Natural Habitats &c.) Regulations 1994 and the Countryside and Rights of Way Act 2000. Works affecting bats are subject to licensing procedures by the Welsh Assembly Government. The legal protection and licensing procedures are summarised in Appendix 1.

The nests and eggs of all wild birds are protected against taking, damage or destruction under the Wildlife and Countryside Act 1981. Particularly rare species such as barn owl are listed on Schedule 1, which gives them special protection, making it an offence to disturb birds at the nest

The report identifies the legal and policy constraints relevant to bats and nesting birds which may affect the development and gives an indication of potential licensing requirements and mitigation measures that will be required.

1.2 Proposed Works

The buildings are proposed for major refurbishment including extensive internal and external works, partial demolition of the buildings and replacement of the existing roofs including fascias and soffits.

2.0 Survey Methods

2.1 Desk Study

Information on statutory nature conservation designated sites was obtained from the online Countryside Council for Wales (CCW) interactive web-based Protected Sites and Landscapes map¹.

The National Biodiversity Network (NBN) database² was searched for records of protected and Biodiversity Action Plan priority species within the locality.

2.2 Field Study

A visual inspection of the external and interior parts of the buildings were undertaken to locate evidence of current or past bat roosts in accordance with the methodology outlined in the Bat Conservation Trust's Bat Surveys: Good Practice Guidelines (2007). The survey was carried out on 29th June 2011 by Paul Hudson MIEEM, an experienced and licensed bat worker (CCW Licence Number 28819:OTH:CSAB:2011). A high powered torch, an endoscope, binoculars, various inspection mirrors, bat detector (Pettersson D-200) and a ladder were available during the survey.

The exterior of the buildings were searched for evidence of use by bats and birds and to look for features offering roosting potential or allowing access into the interior of the structure. The interior of the buildings was searched for evidence of actual bats and birds as well as signs of bats (droppings, feeding remains, urine staining, scratch marks, noise and the remains of dead bats etc.) and birds (nests, feathers and owl pellets etc.).

Emergence surveys were undertaken on the 30th June and the 14th July 2011 by two surveyors; Paul Hudson on both nights, Angela Hudson on the 30th June and Cari Ormerod on the 14th July. Paul was equipped with an Anabat SD1 frequency division detector interfaced to a Hewlett Packard 2790 PDA whilst Angela and Cari used a BatBox Duet attached to an Edirol digital recording device. Recordings were analysed in real-time using Analook sound analysis software to confirm species identification.

http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/protected-sites-map.aspx

² http://data.nbn.org.uk/imt/?mode=SPECIES&species=NHMSYS0000376160

2.3 Constraints

Several parts of the buildings were considered too hazardous to enter, including the majority of the attic rooms and all of the basements.

The emergence surveys were undertaken in suitable weather conditions during June and July 2011 at a time when bats are active and using summer roosting sites. The surveys were both undertaken in warm weather conditions and in the absence of heavy wind and rain. During the emergence surveys the bat ecologists had unrestricted views of all parts of the buildings. Due to difficulties with access permission it was not possible to undertake dawn re-entry surveys on the buildings.

3.0 Survey Results

3.1 Desk Study

The Severn Estuary Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site lie approximately 250 to the south-east of the site. Bats are not mentioned in the citation of these sites.

Isolated records of noctule, common pipistrelle, soprano pipistrelle, Nathusias' pipistrelle, unidentified myotid bats, and some other unidentified bats have been recorded in the general vicinity of the site in recent years, but there do not appear to be any previous records of bats from the buildings under consideration (NBN gateway, Acer Ecology Ltd records).

3.2 Building Descriptions

The Marine Buildings date from approximately 1865 and stand directly to the west of the Custom House restaurant. The buildings originally formed the grand Marine Hotel but have subsequently been divided into five different buildings. The buildings have been derelict since approximately 1973.

The buildings are situated in a semi-urban setting with an area of broadleaved woodland bordering the buildings the site to the south, Cardiff Bay to the north and the Severn Estuary to the east of the site.

The buildings have three-storeys with attics above. The roof of the buildings is complex with the central three properties ridged and the end two properties with French pavilion roofs. The ridged roofs are of slate which are in very poor condition with large sections missing, and the interiors are therefore exposed to the elements and in a very advanced state of decay. At the rear of the property there are some small two storey extensions with monopitch roofs.

There are several brick chimneys lying slightly just offset from the ridge in the mid roof parapets. The chimneys have not been capped and there is some, albeit limited, potential for access by bats into the flues.

The roof exterior has slightly projecting eaves. At the rear (south) of the buildings these are equipped with wooden fascias and soffits. There are extensive holes and gaps which could allow access by bats.

The exterior walls on the northern and western elevations are of yellow brick facings with bath stone dressings whilst the southern and eastern elevations have been rendered with cement. The render has failed locally exposing the brickwork behind and potentially allowing access by bats into the fill of the wall.

The windows and doors have been boarded up, although there are gaps at the site which could potentially allow access by bats into the interior of the building. Operational security lights are present on the northern exterior of the building.

Internally the properties are in very poor condition. The westernmost 2 properties have suffered extensive internal fire damage whilst the middle floors of the easternmost property have collapsed. The interior of the building is very light due to gaps in the roof and around doorways and windows etc.

3.3 Results of Building Inspections for Bats

No signs of bats were found anywhere in or around the buildings.

There were no signs of roosting butterflies (such as small tortoiseshell *Aglais urticae* and peacock *Inachis io*), roosting moths (such as herald moth *Scoliopteryx libatrix*) or cluster flies *Pollenia* sp, all of which frequently occur in buildings used by bats.

3.4 Results of Dusk Emergence Surveys

Emergence survey conducted on 2nd and 15th June recorded good numbers of common pipistrelle bats flying around the building during the survey, but all of these clearly originated off-site. Noctule and soprano pipistrelle were also recorded.

The results of the surveys are shown in the two tables below:

Survey Date: 30th June 2011

Sunset: 21:33 Start Time 21:15; Finish Time: 23:33

Weather Conditions: Dry with no wind. Approximately 5% cloud cover.

2 Surveyors – Angela and Paul Hudson. Angela observed the northern and eastern elevations whilst Paul watched the southern and western elevations. Paul used an Anabat detector interfaced to HP Ipag. Angela used a BatBox Duet attached to a Edirol digital recording device.

Time	Species	Activity Notes			
22:05 - 22:06	Noctule	3 noctule contacts. Bat not seen.			
22:08 - 22:18	Common pipistrelle	1 individual foraging mainly over woodland to rear of property.			
22:12	:12 Noctule 1 Individual flying high over site from south to north.				

22:15 - 22:38	Common pipistrelle	Two individuals foraging close to eastern elevation of building.		
22:15	Noctule	Noctule flying parallel to rear of building from east to west.		
22:22	Common pipistrelle	1 individual foraging over custom house		
22:46	Common pipistrelle	Brief pass by common pipistrelle along front elevation of building.		
22:48	Noctule	1 individual heard faintly flying some distance away from site		
22:50 - 23:15	Common pipistrelle	Up to 4 individuals foraging over woodland to south of building.		
Note: No bats v	vere recorded emerging	from the building.		

Survey Date: 14th July 2011

Sunset: 21:10; Start Time 21:25; Finish Time: 23:25

Weather Conditions: Dry with low wind. Approximately 40% cloud cover.

2 Surveyors — Cari Ormerod and Paul Hudson. Cari observed the northern and eastern elevations whilst Paul watched the southern and western elevations. Paul used an Anabat detector interfaced to HP Ipag. Cari used a BatBox Duet attached to a Edirol digital recording device.

Time	Species	Activity Notes		
21:50	Noctule	1 brief noctule contact. Bat not seen.		
22:01 - 22:41	Common pipistrelle	1 individual flying by the eastern elevation of the buildings.		
22:10 - 22:23	Common pipistrelle	1 individual foraging over woodland at rear of building		
22:23 – 22:55	Common pipistrelle	Up to 4 individuals foraging over woodland at rear of property.		
22:05	Noctule	1 individual flying from south to north over site.		
22:15	Soprano pipistrelle	Brief pass over site flying from south to north.		
	Soprano pipistrelle vere recorded emergino			

3.5 Birds

The buildings are heavily used by feral pigeon, with evidence of recent nesting.

4.0 Discussion

4.1 Bats

The survey found no evidence to indicate that the buildings are occupied by roosting bats, and the buildings were assessed as being of low suitability and attractiveness for roosting bats.

There are many potential routes of access for bats into the interiors of the buildings, arising from the gaps in the roof, fascias and soffits etc. The interiors of the buildings were found to be comparatively well-illuminated and draughty, with ample exposure to the elements via gaps around the boarded up windows and doors, and through gaps in the roof and are therefore unlikely to provide dark, stable microclimates of the kind which bats normally seek for daytime roosting.

The northern elevations of the buildings were noted to be well illuminated at night by the security lighting, which is a contraindicative feature for roosting bats.

The buildings were assessed as having low potential for supporting hibernating bats within cracks and cavities of the walls of the buildings.

No evidence of bat roosting was found during the survey and therefore there is no requirement to apply for a Habitats Regulations licence from the Welsh Assembly Government (WAG) prior to conversion and partial demolition of the buildings.

4.2 Birds

Care must be taken to ensure that any nesting birds are not subjected to accidental harm as a result of the proposed conversion works, bearing in mind that that the Wildlife and Countryside Act 1981 (as amended) makes it an offence to harm individual wild birds, or to damage or destroy the nest, eggs or young.

It is possible that feral pigeon could nest within the buildings during any part of the year, although nesting is less likely to take place during the winter months. Feral pigeon is classed as a pest species, and under the legislation a general licence allows for the killing of birds and the destruction of nests for specific reasons, the most usual being protection of crops or in order to safeguard human health and safety.

5.0 Recommendations

The following recommendations are made:

- Building and demolition works should take place from October to February outside the bird breeding season (March to September inclusive) to avoid the possibility of encountering nesting birds, and reduce the already low probability of encountering either summerroosting bats. Alternatively, any works which must necessarily be carried out during this period should be preceded by a survey to ensure that no nesting birds are present, and any which are present should be allowed to complete their nesting cycle undisturbed.
- The services of an appropriately qualified and licensed bat consultant should be available on an 'on-call' basis at all stages of the works to deal with any unexpected encounters with bats or nesting birds.
- Building contractors should be warned of the possible presence of roosting bats (and/or nesting birds), and of their protected status. It should be clearly understood that in the event of any bats (or occupied birds' nests) being found the contractor must halt works and seek advice from the bat consultant or the Countryside Council for Wales.

6.0 References

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Welsh Assembly Government (WAG 2001) New Guidance for Local Planning Authorities on European Protected Species and Changes in Licensing Procedures. Circular 23/2001.

Welsh Assembly Government (WAG 2000) European Protected Species: Guidance Note. Inhouse guidance note.

Appendix 1: Legislation Protecting Bats and Their Roosts

There are about 17 resident species of bat found in the UK. All are small, nocturnal, flying, insectivorous mammals that are under considerable conservation threat and many having undergone massive population declines over the last century. Some species, such as pipistrelle bats still remain relatively common and widespread in the UK, while others, such as greater horseshoe bats, have an extremely restricted distribution.

Most bats will use a variety of roosts of different types throughout the year. The winter hibernation sites have a stable mild temperature, and bats will move sites if conditions change unfavourably. Caves, buildings and trees are typical hibernation sites. Bat colonies reform in spring. A colony may consist of many individuals (sometimes hundreds of bats) of mixed age and sex. Roosts may be in a variety of situations, including tree holes, caves, buildings and other secure crevices or internal spaces with appropriate stable temperatures and humidity. Bats may change roost locations many times during the course of a year and colonies may split up and reform during this period. Males occupy solitary roosts in autumn, to which they attract females for mating.

All bat species and their roosts are fully protected under the amended Wildlife and Countryside Act 1981 through inclusion in Schedule 5. All bats are also protected under Schedule 2 of the Conservation (Natural Habitats, etc.) Regulations 1994 (the 'Habitats Regulations') which defines 'European Protected species of animal'. These pieces of legislation make it illegal to deliberately or recklessly:

- kill, injure or capture bats;
- disturb bats (whether it is a roost or not);
- damage, destroy, or obstruct access to bat roosts;
- possess or transport a bat or any part of a bat unless acquired legally;
- sell, barter or exchange bats or parts of bats.

Both the animals themselves and any structures or places used for shelter and protection, or as breeding sites and resting places, are fully protected against both intentional or unintended but 'reckless' disturbance or harm. The roosts are protected irrespective of whether bats are present at the time.

The Welsh Assembly Government can issue licences under the Habitats Regulations to permit otherwise prohibited acts where there is considered to be for imperative reasons of overriding public interest (primarily developments). Licences for certain activities can be granted providing:

 the action is in the interests of public health or public, safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment.

- 2. that there is no satisfactory alternative.
- that the action proposed will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

Conservation status is assessed as favourable when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long term basis as a viable component of its natural habitats,
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future,
- there is, and will probably continue to be, a sufficiently large habitat to maintain the population on a long term basis.

Failure to obtain a derogation would render any actions which cause harm or disturbance to bats illegal, including any activities which might be undertaken under a valid planning consent. The possession of planning consent does not alleviate or over-ride the requirements of the Habitats Regulations and is no guarantee that a derogation will obtained. The Welsh Assembly Government take approximately 8 to 10 weeks to process licence applications.

Sites supporting internationally important populations of greater horseshoe, lesser horseshoe, barbastelle Bechstein's and greater mouse-eared bat can be designated as Special Areas of Conservation (SACs) as set out under Annexes II and IV of the EC Habitats and Species Directive. This protection means that there is a statutory obligation to protect areas used by these species for foraging as well as for roosting in order to maintain them in favourable conservation status.

Sites supporting nationally important bat populations can be designated as Sites of Special Scientific Interest (SSSIs). The criteria for selecting SSSIs on the basis of their bat populations are provided in the Guidelines for the Selection of Biological SSSIs (NCC 1989). The criteria are as follows:

- Greater horseshoe All main breeding roosts and all winter roosts containing 50 or more adult hats
- Lesser horseshoe All breeding roosts containing 100 or more adult bats and all winter roosts containing 50 or more bats.
- Barbastelle, Bechstein's and grey long-eared bats Any traditional breeding roosts.
- Natterer's, Daubenton's, whiskered, Brandt's, serotine, noctule and Leisler's bats exceptionally
 large breeding colonies with a long history of usage of a particular site.
- Mixes roosts all hibernacula containing four or more species and 50 or more individuals; three species and 100 or more individuals or two species and 150 or more individuals. In some parts of the UK where such large roosts are not found these criteria may be lower.

Sites supporting regionally important bat populations can be designated as Sites of Importance for Nature Conservation (SINCs). The guidance for selecting SINCs in South Wales on the basis of their bat populations are provided in *the Guidelines for the Selection of Wildlife Sites in South Wales*. The guidelines are as follows:

- any significant roosting sites including vital flight and commuting routes and priority feeding areas attached to roosts³.
- Significant winter roosting sites (hibernation roosts).

Significance levels vary depending on the species and are defined in the table below:

Species ++ (Priority species) + (Species of conservation concern)	Maternity Roost	Other Roost Types e.g. Hibernation	Known to breed in Wales
Barbastelle (Barbastella barbastellus) ++	Any	Any	
Bechstein's (Myotis bechsteinii) ++	Any	Any	
Brandt's (Myotis brandti) +	10	5	Yes
Brown long-eared (<i>Plecotus auritus</i>) +	25	5	Yes
Common pipistrelle (Pipistrellus pipistrellus) ++	50	5	Yes
Daubenton's (Myotis daubentoni) +	Any	Any	Yes
Greater horseshoe (Rhinolophus ferrumequinum) ++	Any	Any	Yes
Leislers (Nyctalus leisleri) +	Any	Any	
Lesser horseshoe (Rhinolophus hipposideros) ++	Any	Any	Yes
Nathusius' pipistrelle (<i>Pipistrellus nathusii</i>) +	Any	Any	
Natterer's (Myotis nattereri) +	10	5	Yes
Noctule (Nyctalus noctula) +	Any	Any	Yes
Serotine (Eptesicus serotinus) +	Any	Any	Yes
Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) ++	120	5	Yes
Whiskered (Myotis mystacinus) +	10	5	Yes

SINCs are considered to have substantive nature conservation value in the regional context. They are usually designated at the county or county borough level by the relevant local planning authority, and are recognised as a planning constraint in the relevant statutory development plan.

Seven of the UK species of bat (soprano pipistrelle, barbastelle, Bechstein's, noctule, brown long-eared, lesser horseshoe and greater horseshoe bats) have been listed on the UK Biodiversity Action Plans (BAP) as conservation priorities. These species in addition to common pipistrelle are also listed as species of principal importance for the conservation of biodiversity in Wales under the Natural Environment and Rural Communities (NERC) Act 2006.

³ 'Roosts' include maternity, pre/post-maternity, hibernation, mating and male roosts. Multi-species occupancy and feeding sites targeted by several species are considered to be particularly important.

Appendix 1: Legislation Protecting Bats and Their Roosts

There are about 17 resident species of bat found in the UK. All are small, nocturnal, flying, insectivorous mammals that are under considerable conservation threat and many having undergone massive population declines over the last century. Some species, such as pipistrelle bats still remain relatively common and widespread in the UK, while others, such as greater horseshoe bats, have an extremely restricted distribution.

Most bats will use a variety of roosts of different types throughout the year. The winter hibernation sites have a stable mild temperature, and bats will move sites if conditions change unfavourably. Caves, buildings and trees are typical hibernation sites. Bat colonies reform in spring. A colony may consist of many individuals (sometimes hundreds of bats) of mixed age and sex. Roosts may be in a variety of situations, including tree holes, caves, buildings and other secure crevices or internal spaces with appropriate stable temperatures and humidity. Bats may change roost locations many times during the course of a year and colonies may split up and reform during this period. Males occupy solitary roosts in autumn, to which they attract females for mating.

All bat species and their roosts are fully protected under the amended Wildlife and Countryside Act 1981 through inclusion in Schedule 5. All bats are also protected under Schedule 2 of the Conservation (Natural Habitats, etc) Regulations 1994 (the 'Habitats Regulations') which defines 'European Protected species of animal'. These pieces of legislation make it illegal to deliberately or recklessly:

- kill, injure or capture bats;
- disturb bats (whether it is a roost or not);
- damage, destroy, or obstruct access to bat roosts;
- possess or transport a bat or any part of a bat unless acquired legally;
- sell, barter or exchange bats or parts of bats.

Both the animals themselves and any structures or places used for shelter and protection, or as breeding sites and resting places, are fully protected against both intentional or unintended but 'reckless' disturbance or harm. The roosts are protected irrespective of whether bats are present at the time.

The Welsh Assembly Government can issue licences under the Habitats Regulations to permit otherwise prohibited acts where there is considered to be for imperative reasons of overriding public interest (primarily developments). Licences for certain activities can be granted providing:

 the action is in the interests of public health or public, safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment.

- 2. that there is no satisfactory alternative.
- that the action proposed will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

Conservation status is assessed as favourable when:

- population dynamics data on the species concerned indicate that it is maintaining itself on a long term basis as a viable component of its natural habitats,
- the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future,
- there is, and will probably continue to be, a sufficiently large habitat to maintain the population on a long term basis.

Failure to obtain a derogation would render any actions which cause harm or disturbance to bats illegal, including any activities which might be undertaken under a valid planning consent. The possession of planning consent does not alleviate or over-ride the requirements of the Habitats Regulations and is no guarantee that a derogation will obtained. The Welsh Assembly Government take approximately 8 to 10 weeks to process licence applications.

Sites supporting internationally important populations of greater horseshoe, lesser horseshoe, barbastelle Bechstein's and greater mouse-eared bat can be designated as Special Areas of Conservation (SACs) as set out under Annexes II and IV of the EC Habitats and Species Directive. This protection means that there is a statutory obligation to protect areas used by these species for foraging as well as for roosting in order to maintain them in favourable conservation status.

Sites supporting nationally important bat populations can be designated as Sites of Special Scientific Interest (SSSIs). The criteria for selecting SSSIs on the basis of their bat populations are provided in the Guidelines for the Selection of Biological SSSIs (NCC 1989). The criteria are as follows:

- Greater horseshoe All main breeding roosts and all winter roosts containing 50 or more adult bats.
- Lesser horseshoe All breeding roosts containing 100 or more adult bats and all winter roosts containing 50 or more bats.
- Barbastelle, Bechstein's and grey long-eared bats Any traditional breeding roosts.
- Natterer's, Daubenton's, whiskered, Brandt's, serotine, noctule and Leisler's bats exceptionally large breeding colonies with a long history of usage of a particular site.
- Mixes roosts all hibernacula containing four or more species and 50 or more individuals; three
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6.0 References

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Welsh Assembly Government (WAG 2000) European Protected Species: Guidance Note. Inhouse guidance note.

Appendix 2: Photographic Record, June 2011



Plate 1: Front (Northern) Elevation



Plate 2: Rear (Southern) Elevation



Plate 3: Side (Western) Elevation



Plate 4: Internal View



Plate 5: Internal View

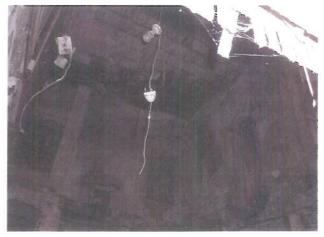


Plate 6: Internal View